

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

LIMOLINER, INC.  
Plaintiff

vs.

SETRA OF NORTH AMERICA, INC.  
Defendant

)  
)  
)  
)  
)  
)  
)

NO. 05-11888

SETRA OF NORTH AMERICA, INC.'S MOTION TO HAVE  
MARIO M. IVELJIC APPEAR *PRO HAC VICE*

Setra of North America, Inc. ("Setra"), by and through the undersigned counsel, hereby moves pursuant to Local Rule 83.5.3(b) for the admission of Attorney Mario M. Iveljic *pro hac vice*. Attorney Iveljic is an associate in the law firm of Cremer Kopon Shaughnessy & Spina, LLC, 180 North LaSalle Street, Suite 3300, Chicago, Illinois 60601.

In support of this motion, and as set forth in the affidavit attached hereto as Exhibit A, Setra and the undersigned state as follows:

1. Mario M. Iveljic is admitted to practice law in the State of Illinois and the United States District Court for the Northern District of Illinois.
2. There are no disciplinary proceedings against Mario M. Iveljic in any jurisdiction in which he is admitted to practice law.
3. Attorney Iveljic is familiar with the applicable procedural rules, including the Local Rules of the United States District Court for the District of Massachusetts.
4. A member in good standing of this Court, James M. Campbell of Campbell Campbell Edwards & Conroy, Professional Corporation, One Constitution

Plaza, Boston, MA 02129, will serve as local counsel and assist Attorney Iveljic with this matter.

For the foregoing reasons, this Court should permit Attorney Mario M. Iveljic to appear *pro hac vice* on behalf of Setra for the duration of this lawsuit.

SETRA OF NORTH AMERICA, INC.,

By its Attorney,

/s/ James M. Campbell

James M. Campbell BBO # 541882  
Campbell Campbell Edwards & Conroy, P.C.  
One Constitution Plaza  
Boston, MA 02129  
(617) 241-3000

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the following counsel of record for Limoliner, Inc., via first class mail on January 3, 2006:

Jonathon D. Friedmann, Esq.  
Rudolph Friedmann LLP  
92 State Street  
Boston, MA 02109

/s/ James M. Campbell

James M. Campbell

WJC/TRP/maz

381-2-1

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

LIMOLINER, INC.,

Plaintiff,

v.

SETRA OF NORTH AMERICA, INC.,

Defendant.

**NO. 05-11888**

**AFFIDAVIT OF MARIO M. IVELJIC**

MARIO M. IVELJIC, being sworn, deposes and says:

1. I am an Associate at the law firm of CREMER, KOPON, SHAUGNESSY & SPINA, LLC, 180 North LaSalle Street, Suite 3300, Chicago, IL 60601, and make this Affidavit in support of my application to be admitted *pro hac vice* to the bar of this Court.

2. I received a Juris Doctor degree from the Chicago-Kent College of Law in 2003, and was admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois in 2003.

3. I practice as a defense attorney in the areas of products liability, construction litigation, professional negligence, and complex class actions. I also serve as national counsel for a variety of product manufacturers and other institutional clients.

4. I have never been held in contempt of court.

5. I have never been censured, suspended or disbarred by any court.

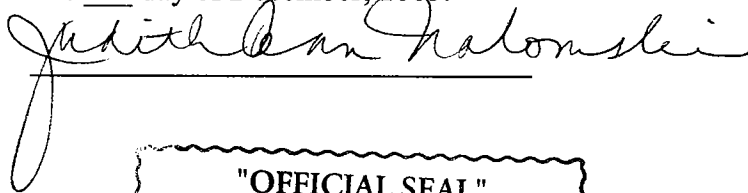
6. I have read and am familiar with the provisions of the Judicial Code (Title 28, U.S.C.) that pertain to the jurisdiction of and practice in United States District Courts, the Rules of Civil Procedure for the District Courts, the Federal Rules of Evidence for the United States Courts and Magistrates, and the Rules of the United States District Court for the District of Massachusetts.

7. I have read the Rules of Professional Conduct of the American Bar Association, and will faithfully adhere thereto.

Dated this 21<sup>st</sup> day of December, 2005.

  
\_\_\_\_\_  
MARIO M. IVELJIC

Subscribed and Sworn to me before me  
this 21<sup>st</sup> day of December, 2005.

  
\_\_\_\_\_  
JUDITH ANN NALOMSKI

